

**REMARKS**

In the Official Action mailed 23 December 2005, the Examiner reviewed claims 34-60. The Examiner has rejected claims 34-36, 38, 43-45, 47, 52-54 and 56 under 35 U.S.C. §103(a); has rejected claims 37, 46 and 55 under 35 U.S.C. §103(a); and has rejected claims 39-42, 48-51 and 57-60 under 35 U.S.C. §103(a).

Claims 34, 43 and 52 are amended to correct a typographical error. Claims 34-60 remain pending.

The rejections are respectfully traversed below.

**Rejection of Claims 34-36, 38, 43-45, 47, 52-54 and 56 under 35 U.S.C. §103(a)**

The Examiner has rejected claims 34-36, 38, 43-45, 47, 52-54 and 56 under 35 U.S.C. §103(a) as being unpatentable over Aiken (US 6658626) in view of Ogawa (US 5438661). Applicant respectfully requests reconsideration because the references do not teach all the elements in the claims.

First, with respect to independent claim 34, the Examiner takes the position that Aiken teaches all the limitations in the claim with the exception of “composing ... differences.” Office Action, page 3. However, this position is mistaken. Aiken does not describe any of the steps in claim 34.

First, the “parsing” steps in claim 34, which require parsing the first and second documents into groups delineated by block level markup tags as stated in the first two steps of claim 34 is not shown in Aiken. Rather, Aiken describes translating a document referred to as a string, into token strings that “represents and preserves the structure and content of the original raw data string.” Aiken, column 5, lines 43-46. The token strings are then processed to remove “unimportant words”, and to remove “punctuation, white spaces and capitalization.” Aiken, column 5, lines 54-63). A hashing technique then operates on the token strings on a character by character basis, creating hash values that are used for comparison with other documents. Aiken, column 6, lines 9-58. Although the token strings of Aiken are said to preserve the structure and content of the original raw string, Aiken does not even mention the possibility of block level markup tags in the documents being processed, much less using such block level markup tags for the purpose of delineating groups within the documents. The Examiner cites column 16, lines 63-67 of Aiken as suggesting the “parsing” limitation. The cited passage discusses the user interface shown in Figure 6 of Aiken, and states that the document being analyzed has segments.

However, the passage does not mention delineation of segments by block level markup tags as required by the claim. Therefore, Applicant submits that this citation by the Examiner does not suggest the parsing steps in claim 34.

Next, Aiken does not teach “executing a routine … to match groups … and to identify differences between said groups...” as recited in claim 34. Rather, Aiken matches hash values computed from token strings. There is no attempt in Aiken to match groups delineated by a parsing step that is based on segmentation of the document in any form. Aiken does not identify differences between the matching groups as required by claim 34. Rather, Aiken finds matching character strings in the document by comparing hash values, without reference to structure of the documents. The Examiner cites column 3, lines 65-67 and column 17, lines 6-8 as suggesting the “executing a routine …” limitation. The citation at column 3, lines 65-67 describes the use of HTML links to refer to matching passages in documents being analyzed. The HTML links are added to the user interface in Aiken, and not part of the original documents being compared. Furthermore, the links are not related to matching groups based on segmentation of the documents by block level markup tags. Rather, the links connect matching text strings in the documents, without reference to the structures of the documents. The passage at column 17, lines 6-8 cited by the Examiner describes the use of sub-bands in an overview bar on user interface to identify matching strings in the documents being analyzed. This technique identifies similarities in the documents, not differences as required by the claims, and is not constrained by segmentation of the documents in any manner, much less by segmentation by parsing according to block level markup tags. Therefore, Aiken does not suggest the “executing …” step of claim 34.

Aiken does not compose a difference document as required in claim 34, and the Examiner admits this difference.

Finally, Aiken does not render an image of a difference document which preserves visual formatting of one of the documents as stated in claim 34. Rather, Aiken presents a user interface that is generic as to the structure of the documents. Although it does appear to preserve segmentation of the content of the documents involved into “content segments” which may correspond to sentences or paragraphs for example, there is no suggestion in Aiken that the display in the user interface preserves visual formatting of the documents.

Indeed, because Aiken describes a process for finding similarities in documents, and for highlighting the similarities, the visual formatting of the documents involved would seem

irrelevant to Aiken. See, Aiken, column 3, lines 35-38. The process in Aiken is used to finding documents with similar content, and can be used for example to detect an email message having confidential information by comparing the email to other documents that include the confidential information. See, Aiken, column 3, lines 1-10.

The Examiner relies upon combining the teaching of Ogawa with Aiken to suggest modifying Aiken to add a step of composing a difference document. First, Ogawa is a version management process, not related to analyzing documents for matching text passages as is taught by Aiken. Therefore, one having skill in the art would not apply the teaching of Ogawa to Aiken. Aiken teaches analyzing unrelated documents for matching content. Ogawa manages the editing process of a single document. The techniques are executed for different reasons and perform completely different processes.

The Examiner cites column 2, lines 47-50 of Ogawa as suggesting the “composing ...” step of claim 34. The cited passage refers to creation of an “operation history management table” when creating a new version of a document. This process is not based on the results of comparison of matching groups within two documents, as required by the claim. Rather, the operation management history table records editing steps within a single document. Therefore, even if such a history table could be added to the process of Aiken, the resulting combination would not suggest the elements of claim 34.

Claims 35, 36 and 38 depend from claim 34 and are allowable for at least the same reasons, and because of the unique combinations recited.

Independent claim 43 recites a computer system configured to execute the process of claim 34, and includes similar limitations. Therefore, claim 43 is patentable over the combinations of references for at least the same reasons as claim 34.

Claims 44, 45, and 47 depend from claim 43 and are allowable for at least the same reasons, and because of the unique combinations recited.

Independent claim 52 recites an article of manufacture storing a computer program configured to execute the process of claim 34, and includes similar limitations. Therefore, claim 52 is patentable over the combinations of references for at least the same reasons as claim 34.

Claims 53, 54, and 56 depend from claim 52 and are allowable for at least the same reasons, and because of the unique combinations recited.

Accordingly, Applicant submits that the Examiner has misread the claims, or the references, and that the Examiner’s *prima facie* case is incomplete.

Accordingly, reconsideration of the rejection of claims 34-36, 38, 43-45, 47, 52-54 and 56 is respectfully requested.

Rejection of Claims 37, 46 and 55 under 35 U.S.C. §103(a)

The Examiner has rejected claims 37, 46 and 55 under 35 U.S.C. §103(a) as being unpatentable over Aiken in view of Ogawa, further in view of Blumer et al. (US 5890171).

Claims 37, 46, and 55 depend from claims 34, 43 and 52, respectively, and are allowable for at least the same reasons, and because of the unique combinations recited.

Accordingly, reconsideration of the rejection of claims 37, 46 and 55 is respectfully requested.

Rejection of Claims 39-42, 48-51 and 57-60 under 35 U.S.C. §103(a)

The Examiner has rejected claims 39-42, 48-51 and 57-60 under 35 U.S.C. §103(a) as being unpatentable over Aiken, in view of Ogawa, further in view of Aoyama et al. (US 5956726).

Claims 39-42, 48-51, and 57-60 depend from one of claims 34, 43 and 52, and are allowable for at least the same reasons, and because of the unique combinations recited.

Accordingly, reconsideration of the rejection of claims 39-42, 48-51 and 57-60 is respectfully requested.

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### CONCLUSION

It is respectfully submitted that this application is now in condition for allowance, and such action is requested.

The Commissioner is hereby authorized to charge any fee determined to be due in connection with this communication, or credit any overpayment, to our Deposit Account No. 50-0869 (INXT 1021-2).

Respectfully submitted,



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